

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRUCE RUSH, as a participant in and on behalf of the Segerdahl Corporation employee stock ownership plan, and on behalf of a class of all others who are similarly situated,

Plaintiff,

v.

GREATBANC TRUST COMPANY;
MARY LEE SCHNEIDER; RICHARD
JOUTRAS; RODNEY GOLDSTEIN;
PETER MASON; ROBERT CRONIN;
JOHN DOE DEFENDANTS 1-10; and
SEGERDAHL CORP. (d/b/a SG360),

Defendants.

Case No.: 1:19-cv-00738

Judge Andrea R. Wood
Magistrate Judge Susan E. Cox

**DEFENDANTS' UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD & OTHER RELIEF**

Defendants GreatBanc Trust Company, Peter Mason, and Segerdahl Corp. d/b/a SG360° (“Defendants”), by and through their attorneys, Charles F. Seemann III (pro hac vice application forthcoming) and Sarah J. Gasperini of Jackson Lewis, P.C., move this court for an extension of time to and including April 19, 2019 to answer or otherwise plead and to re-set the parties’ initial status hearing to a date thereafter convenient for the Court. In support of this unopposed motion, Defendants state:

1. On February 5, 2019, Plaintiff filed a complaint on behalf of himself and others similarly situated seeking redress against Defendants for claims arising under the Employee Retirement Income Security Act. (Doc. 1.)
2. On or about February 15, 2019, Plaintiff served the complaint upon GreatBanc Trust Company. GreatBanc’s responsive pleading is thus due on March 8, 2019.

3. On or about February 16, 2019, Plaintiff served the complaint upon Peter Mason. Mr. Mason's responsive pleading is thus due on March 11, 2019.

4. On or about February 26, 2019, Plaintiff served the complaint upon Segerdahl Corp. d/b/a SG360°. Segerdahl's responsive pleading is thus due on March 19, 2018.

5. The remaining defendants have not yet been served.

6. The parties are currently set to appear for an initial status hearing on April 9, 2019.
(Doc. 8.)

7. Defendants' counsel has recently been retained and requires additional time to investigate Plaintiff's claims and prepare the served Defendants' responsive pleadings.

8. Additionally, Defendants' counsel is working to contact defendants not yet served regarding the possibility of a joint defense.

9. On March 6, 2019, Defendants' counsel contacted Plaintiff's counsel, James Bloom, seeking at least a 30-day extension of the served Defendants' time to answer or otherwise plead and to make Defendants' responsive pleading deadline uniform. Plaintiff's counsel does not oppose these requests.

10. This motion is not brought for purposes of delay and will not prejudice the parties.

11. This is the first extension of time that Defendants have sought in this matter.

WHEREFORE, Defendants, GreatBanc Trust Company, Peter Mason, and Segerdahl Corp d/b/a SG360° respectfully request that the Court enter an order extending their deadline to file their respective responsive pleadings to and including April 19, 2019 and resetting the Parties' April 9, 2019 status date to a later date convenient for the Court.

Dated: March 7, 2019

Respectfully submitted,

**GREATBANC TRUST COMPANY, PETER
MASON, AND SEGERDAHL CORP. D/B/A
SG360°**

/s/ Sarah J. Gasperini

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CERTIFICATE OF SERVICE

I, Sarah J. Gasperini, certify that on March 7, 2019, I caused the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD & OTHER RELIEF** to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system.

/s/ Sarah J. Gasperini